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December 19, 2024

**VIA ECF**

The Honorable Jessica G. L. Clarke  
United States District Judge  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl St., Courtroom 20C  
New York, NY 10007-1312

**Re: *Doe v. Black*, No. 1:23-cv-06418-JGLC – Letter-Motion for Leave to File Under Seal**

Dear Judge Clarke:

We represent defendant Leon Black in this matter. Pursuant to Your Honor's Individual Rule 5(e)(ii), we respectfully request leave to file under seal a letter and exhibit, dated today, to Your Honor responding to Plaintiff's letter, dated December 16, 2024 (ECF Doc. No. 178), seeking modification of Judge Rakoff's Sealed Order.

The contents of the letter and exhibit relate to (1) Plaintiff's letter, which was filed under seal, and (2) materials and proceedings that are currently under seal in *JPMC*, and were provided to Defendant by the *JPMC* Court with the understanding that they would be treated confidentially under the confidentiality order in this case. We respectfully request that they be filed under seal in order to continue to comply with that understanding.

On December 19, 2024, Plaintiff was provided with a copy of the letter and exhibit and given the opportunity to review their content. We did not receive a response from Plaintiff before filing the letter.

Respectfully submitted,

/s/ Peter A. Gwynne